

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

DUANE MORRIS LLP

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Attorneys for ACE American Insurance Company

In re:

BLOCKFI INC., *et al.*,²

Debtors

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered under a
Confirmed Plan¹)

Honorable Michael B. Kaplan

**JOINDER OF ACE AMERICAN INSURANCE COMPANY IN MOTION OF
ARCH INSURANCE COMPANY, BERKLEY INSURANCE COMPANY,
BERKSHIRE HATHAWAY SPECIALTY INSURANCE COMPANY, U.S. SPECIALTY
INSURANCE COMPANY, AND XL SPECIALTY INSURANCE COMPANY
TO ENFORCE PLAN AND CONFIRMATION ORDER**

ACE American Insurance Company, by and through its undersigned counsel, hereby files this joinder (the “Joinder”) in the motion (the “Motion”) of Arch Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, U.S. Specialty Insurance

¹ On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the “Plan”) [Docket No. 1609].

² The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors’ service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

Company, and XL Specialty Insurance Company [Docket No. 2221] for an order enforcing the *Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1309] and the Confirmation Order,³ which this Court entered on October 3, 2023.

WHEREFORE, ACE American Insurance Company respectfully requests that this Court (i) grant the relief requested in the Motion and enter an order enforcing the Plan and Confirmation Order, and (ii) grant such other and further relief as the Court may deem just and proper.

Dated: April 5, 2023

Respectfully submitted,

/s/ Wendy M. Simkulak

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³ See Revised Findings of Fact, Conclusions of Law, and Order (I) Approving the Disclosure Statement Relating to the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code on a Final Basis and (II) Confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) [Docket No. 1660] (the “Confirmation Order”).